

UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF WEST VIRGINIA

FILED

NOV 19 2019

U.S. DISTRICT COURT-WVND  
MARTINSBURG, WV 25401

UNITED STATES OF AMERICA,

v.

Criminal No. 3:19-CR-59

Violations: 18 U.S.C. § 641

CRYSTAL M. TRESS  
Defendant.

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(Theft of Government Property)

On or between the 27th day of April 2018 and March 18, 2019, in Berkeley County, in the Northern District of West Virginia, the defendant, **CRYSTAL M. TRESS**, willfully and knowingly did embezzle, steal, purloin, and convert to her own use, United States currency of a value exceeding \$1,000 of the goods and property and property made under contract of the United States, which said property had come into the possession and under the care of **CRYSTAL M. TRESS**, by virtue of her employment with the Veterans Canteen Service, in violation of 18 U.S.C. § 641.

**FORFEITURE ALLEGATIONS**

*Theft of Public Money, Property, or Records*

1. Pursuant to Title 28, United States Code, Section 2461(c), Title 18, United States Code, Sections 981(a)(1)(C), and 1956(c)(7)(D), and Title 21, United States Code, Section 853, the government will seek the forfeiture of property as part of the sentence imposed in this case; that is, the forfeiture of any property, real or personal, which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code, Section 641, or a conspiracy to violate such offense.

2. Pursuant to Title 28, United States Code, Section 2461(c), the government will seek forfeiture of substitute property up to the value of property subject to direct forfeiture that is not available for forfeiture on account of any act or omission contemplated by Title 21, United States Code, Section 853(p)(1).

A true bill,

/s/ \_\_\_\_\_  
Grand Jury Foreperson

/s/ \_\_\_\_\_  
WILLIAM J. POWELL  
UNITED STATES ATTORNEY

Kimberley D. Crockett  
Kimberley D. Crockett  
Assistant United States Attorney